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Attorneys for Defendant GUANGZHI CAO

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

TESLA, INC., a Delaware corporation,

Plaintiff,

V.

GUANGZHI CAO, an individual,

Defendant.

CASE NO. 3:19-cv-01463

**APPLICATION FOR LEAVE TO
APPEAR BY TELEPHONE AT THE
INITIAL CASE MANAGEMENT
CONFERENCE, OR IN THE
ALTERNATIVE, TO CONTINUE THE
INITIAL CASE MANAGEMENT
CONFERENCE UNTIL JULY 31, 2019,
AND [PROPOSED] ORDER THEREON**

1 Pursuant to the Standing Order for Civil Cases Before Judge Vincent Chhabria (“Civil Standing
2 Order”), undersigned counsel respectfully requests leave of Court to appear by telephone at the initial
3 case management conference scheduled for July 10, 2019, in the above-captioned matter.

4 Good cause exists to allow a telephonic appearance. The initial case management conference in
5 this matter was previously scheduled, pursuant to the stipulation of the parties and the prior order of this
6 Court, for July 3, 2019, at 10:00 a.m., at which time all parties were prepared to appear in person. *See*
7 Dkt. Nos. 23 & 24. The Court *sua sponte* continued the conference until July 10. Dkt. No. 25.

8 Undersigned counsel for Defendant Cao is unavailable to appear in-person on July 10 due to his required
9 attendance at a previously scheduled mediation in Boston, Massachusetts, on July 10-11. (Attorney
10 Gabriela Kipnis, the only other lawyer at Conrad & Metlitzky LLP with knowledge about this case, is
11 presently on parental leave and cannot attend the conference in person on July 3, either.)

12 All counsel of record in the case are aware of the Court’s Civil Standing Order and, in particular,
13 the requirement that all attorneys must appear telephonically if leave is given for any of them to do so.
14 Undersigned counsel represents that it is the preference of all parties to proceed with telephonic
15 appearances on July 10, 2019 (and that all attorneys are available to do so at the rescheduled time of
16 2:30 p.m., pursuant to Paragraph 18 of the Court’s Civil Standing Order). If the Court does not find
17 good cause to permit telephonic appearances, then, in the alternative, undersigned counsel respectfully
18 requests (with the agreement and consent of opposing counsel) that the initial case management
19 conference be continued until July 31, 2019, at 10:00 a.m., which is the next time when counsel for all
20 parties are available to appear in person.

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22 DATED: July 2, 2019

Respectfully submitted,

23 CONRAD & METLITZKY LLP
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/s/ *Mark R. Conrad*
MARK R. CONRAD
GABRIELA KIPNIS
Attorneys for Defendant Guangzhi Cao

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2 **[PROPOSED] ORDER**
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5 The Court, having considered Application for Leave To Appear by Telephone at the Initial Case
6 Management Conference, hereby GRANTS leave for the parties to attend the conference by telephone,
7 and hereby CONTINUES the conference until July 10, 2019, at 2:30 p.m.
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9 IT IS SO ORDERED.
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Dated: July ___, 2019

HON. VINCE CHHABRIA
United States District Judge